



**THE CITY OF NEW YORK
LAW DEPARTMENT**

100 CHURCH STREET
NEW YORK, NY 10007

HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

Samantha Schonfeld
Phone: 212-356-2183
Fax: 212-356-2019
E-mail: sschonfe@law.nyc.gov

March 28, 2024

Via ECF

Honorable Edgardo Ramos
United States District Court for the
Southern District of New York
40 Foley Square, Courtroom 619
New York, NY 10007

Re: Nunzio Calce et al., v. The City of New York
Civil Action No. 1:21-8208 (ER)

Dear Judge Ramos:

This Office represents Defendant, the City of New York, in the above-entitled action and submits this letter-motion pursuant to Rule 1E of Your Honor's Individual Practices in Civil Cases to request a 4-week extension of time for Defendant to file its cross-motion for summary judgment and opposition to Plaintiff's motion for summary judgment. I reached out to Plaintiffs' counsel to obtain his consent but have not received a response.

On February 2, 2024, Your Honor entered an Order setting deadlines for the parties' summary judgment motion briefing schedule. See ECF No. 24. It is respectfully requested that the deadlines for the parties' remaining summary judgment briefs each be extended pursuant to the following schedule:

Event	Original Deadline	Proposed Deadline
Defendant's opposition and cross motion	March 29, 2024	April 26, 2024
Plaintiff's opposition and reply	April 26, 2024	May 24, 2024
Defendant's reply	May 10, 2024	June 7, 2024

Good cause exists for the requested extension because counsel for Defendant was out of the office on a previously scheduled vacation and requires additional time to fully research the facts and legal arguments set forth in Plaintiffs' motion for summary judgment and to draft Defendant's own cross-motion for summary judgment. This is the parties' second request for an extension of the summary judgment motion briefing schedule. No other dates will be affected by this request.

Thank you for your time and consideration of this request.

Respectfully submitted,

/s/ Samantha Schonfeld

cc: All Counsel of Record (via ECF)